

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

RE/MAX INTERNATIONAL, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO.
	)	4:07-CV-02426
	)	
TREND SETTER REALTY, LLC, a Texas limited	)	
liability company;	)	
	)	
PAVNOUTY ABRAHAM , an individual; and	)	
	)	
DEBORAH N. MILLER, an individual	)	
	)	
Defendants.	)	

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**JOINT MOTION FOR ENTRY OF FINAL JUDGMENT AND PERMANENT  
INJUNCTION AGAINST DEFENDANTS**

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Plaintiff RE/MAX International, Inc. (“RE/MAX” or “Plaintiff”) and Defendants Trend Setter Realty, LLC (“Trend Setter”); Pavnouty Abraham (“Abraham”), and Deborah N. Miller (“Miller”) (collectively “Defendants”), hereby stipulate to, and jointly move for entry of, the Final Judgment and Permanent Injunction filed contemporaneously herewith. As grounds therefore, the parties state as follows:

1. RE/MAX commenced this action against Defendants on July 25, 2007.
2. The Court’s Order of September 3, 2009 [Dkt No. 60] granting RE/MAX’s Motion for Partial Summary Judgment resolved liability on RE/MAX’s Counts I, III, IV, VI, VII, and VIII, and IX and dismissed Defendants’ counterclaims. RE/MAX’s Counts II and V were voluntarily dismissed without prejudice on September 24, 2009. [Dkt. No. 64]. The Court entered an Amended Scheduling Order setting a deadline of November 13, 2009 for submission

of RE/MAX's motions for partial summary judgment as to damages and for attorneys' fee award. [Dkt. No. 63].

3. The parties have conferred and hereby stipulate and agree to the entry of the proposed Final Judgment and Permanent Injunction attached hereto as Exhibit A.

4. The parties agree to be bound by the terms and conditions of the proposed Final Judgment and Permanent Injunction pending consideration of this stipulated motion by the Court.

WHEREFORE Plaintiff RE/MAX International, Inc. and Defendants Trend Setter Realty, LLC , Pavnouty Abraham, and Deborah N. Miller respectfully move the Court for entry of the proposed Final Judgment and Permanent Injunction, together with such further relief as the Court deems proper.

Dated this 9th day of November, 2009.

By: /Anthony F. Matheny/

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LLC, Pavnouty Abraham, and Deborah  
Miller.

**CERTIFICATE OF SERVICE**

I hereby certify that on November 9, 2009, the foregoing was electronically filed using the Court's ECF system through which it will be served on the following party:

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